

# ZMO LAW PLLC

June 23, 2021

*Via ECF*

Hon. Ann M Donnelly  
Eastern District of New York  
US Courthouse, EDNY  
225 Cadman Plaza East  
Brooklyn, NY 11201

RE: *Felipe Rodriguez v. City of New York et al.*, 21-cv-01649 (AMD)(RLM)

Dear Judge Donnelly:

This office represents Felipe Rodriguez in the above-captioned matter. We write to request that the Court reschedule the July 14, 2021, pre-motion conference. Our office is scheduled to begin a trial on July 14 before Judge Rakoff in the Southern District of New York, which we expect to last two weeks. Mark Zuckerman, Counsel for the City Defendants, has advised us that he, too, is unavailable on July 14 as well as during the week beginning August 9. After conferring with Mr. Zuckerman and Steven Silverberg, counsel for the MTA Defendants, we have identified the following dates that work for all parties: July 7, July 12, August 2, August 3, and August 6. If none of these dates is convenient for the Court, the parties will be happy to confer again and provide alternative dates. We write with the consent of all parties.

Thank you for your attention to this case.

Very truly yours,

*Zachary Margulis-Ohnuma*

Zachary Margulis-Ohnuma

CC: Mark D. Zuckerman (via ECF and email)  
Steven Silverberg (via ECF and email)  
Benjamin Notterman (via ECF and email)  
Joel B. Rudin (via email)